

1 COOLEY LLP
BOBBY GHAJAR (198719)
2 (bghajar@cooley.com)
COLETTE GHAZARIAN (322235)
3 (cghazarian@cooley.com)
1333 2nd Street, Suite 400
4 Santa Monica, CA 90401
Telephone: (310) 883-6400
5 KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
6 MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
7 JUDD LAUTER (290945)
(jlauter@cooley.com)
8 ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
9 3175 Hanover Street
Palo Alto, CA 94304
10 Telephone: (650) 843-5000
11 CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
12 (adunning@cgsh.com)
1841 Page Mill Road, Suite 250
13 Palo Alto, CA 94304
Telephone: (650) 815-4131
14 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
KANNON K. SHANMUGAM (*pro hac vice*)
15 (kshanmugam@paulweiss.com)
2001 K Street, NW
16 Washington, DC 20006
Telephone: (202) 223-7300
17 [Full Listing on Signature Page]
18 Counsel for Defendant Meta Platforms, Inc.

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 RICHARD KADREY *et al.*,
23 Individual and Representative Plaintiffs,
24 v.
25 META PLATFORMS, INC., a Delaware
corporation,
26 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**RESPONSE TO ORDER RE OUTSTANDING
SEALING MOTIONS [ECF No. 600]**

Judge: Vince Chhabria

1 Pursuant to the Court's Order [ECF No. 600], ordering the parties to jointly file a table
2 summarizing the outstanding motions to seal, the parties have conferred and the chart describing
3 the active motions to seal is attached hereto as **Exhibit A**.

1 Dated: July 3, 2025

COOLEY LLP

2 By: /s/ Matthew J. Brigham

3 Matthew J. Brigham

COOLEY LLP

BOBBY GHAJAR (198719)

(bghajar@cooley.com)

TERESA MICHAUD (296329)

(tmichaud@cooley.com)

COLETTE GHAZARIAN (322235)

(cghazarian@cooley.com)

1333 2nd Street, Suite 400

Santa Monica, CA 90401

Telephone: (310) 883-6400

COOLEY LLP

MARK WEINSTEIN (193043)

(mweinstein@cooley.com)

KATHLEEN HARTNETT (314267)

(khartnett@cooley.com)

MATTHEW BRIGHAM (191428)

(mbrigham@cooley.com)

JUDD LAUTER (290945)

(jlauter@cooley.com)

ELIZABETH L. STAMESHKIN (260865)

(lstameshkin@cooley.com)

JUAN PABLO GONZÁLEZ (334470)

(jgonzalez@cooley.com)

3175 Hanover Street

Palo Alto, CA 94304

Telephone: (650) 843-5000

COOLEY LLP

PHILLIP MORTON (*pro hac vice*)

(pmorton@cooley.com)

COLE A. POPPELL (*pro hac vice*)

(cpoppell@cooley.com)

1299 Pennsylvania Avenue, NW, Suite 700

Washington, DC 20004-2400

Telephone: (202) 842-7800

CLEARY GOTTLIEB STEEN & HAMILTON
LLP

ANGELA L. DUNNING (212047)

(adunning@cgsh.com)

1841 Page Mill Road, Suite 250

Palo Alto, CA 94304

Telephone: (650) 815-4131

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

KANNON K. SHANMUGAM (*pro hac vice*)

(kshanmugam@paulweiss.com)

2001 K Street, NW

Washington, DC 20006

Telephone: (202) 223-7300